

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA**

**IN THE MATTER OF A COMPLAINT  
REGARDING GABRIEL MICAH STEPHENS**

Case No. 8:21-mj-00055

**MOTION TO SEAL**

The United States of America, by and through its undersigned Assistant United States Attorney, hereby moves this Court to seal the documents submitted in support of the complaint, including the arrest warrant and affidavit. The Court has the inherent authority to seal these documents. *See Baltimore Sun v. Goetz*, 886 F. 2d 60 (4th Cir. 1988). The purpose of the Government's request is to protect the information contained within these documents, to avoid the disclosure of the investigation at this time, to protect the destruction of evidence, and to minimize danger to the public and law enforcement.

Based on the facts in the affidavit, there is reason to believe that disclosure of the information included in the affidavit could seriously jeopardize the investigation by giving targets the opportunity to destroy or tamper with evidence, change patterns of behavior, flee from prosecution, intimidate cooperating and potential witnesses, and endanger the safety of law enforcement and other individuals. For these reasons, the Government submits that the interests in sealing the documents associated with this warrant, outweigh the common-law public right of access and that sealing is "essential to preserve higher values." *See Media Gen. Operations, Inc. v. Buchanan*, 417 F.3d 424, 429-31 (4th Cir. 2005).

Based on the foregoing, the Government requests that the documents associated with this complaint, be filed under seal except that working copies should be made available to the United States Attorney's Office, the Department of Justice, and any other law enforcement agency

designated by the United States Attorney's Office or the Department of Justice.

Respectfully submitted,

M. RHETT DEHART  
ACTING UNITED STATES ATTORNEY

By: *s/William J. Watkins, Jr.*

William J. Watkins, Jr.  
Assistant United States Attorney

June 10, 2021  
Greenville, South Carolina